

1 THE HONORABLE _____
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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9
10 PARLER, LLC,

Case No. 21-cv-00270

11 Plaintiff,

DECLARATION OF DAVID J.
GROESBECK IN SUPPORT OF
PLAINTIFF'S MOTION FOR REMAND
OR IN THE ALTERNATIVE FOR
DISMISSAL WITHOUT PREJUDICE

12 vs.

13 AMAZON WEB SERVICES, INC., and
14 AMAZON.COM, INC.,

15 Defendants.

16 NOTE ON MOTION CALENDAR:
March 26, 2021
Without Oral Argument

17
18 I, David J. Groesbeck, declare and say:

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20 1. I am a practicing attorney in the State of Washington and represent Plaintiff Parler
21 LLC in the above-entitled matter. I am over the age of 18 and I am competent to testify as to the
22 contents herein and all information is made from my personal knowledge.

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24 2. On Wednesday, March 3, 2021, at 12:06 am (PST), I emailed Ms. Ambika Doran,
25 counsel for Amazon Web Services, Inc. I sent Ms. Doran a copy of Parler LLC's Notice of

GROESBECK DECLARATION ISO PLAINTIFF'S
MOTION FOR REMAND
(Case No. 2:21-cv-00270) - 1

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1 Voluntary Dismissal Without Prejudice and Parler LLC's Complaint filed in King County
2 Superior Court, and I provided her with the King County case number. I provided this
3 information as a professional courtesy and not because of any obligation or prior agreement.

4 4. On Wednesday, March 3, in the early morning and afternoon, I emailed and called
5 Ms. Doran several times. In a morning email exchange, Ms. Doran said she was not available
6 to talk. Ms. Doran emailed me later in the day to say that she had concluded a hearing that
7 occurred that morning and had accomplished “other things” she needed to attend to but would
8 be able to talk in the late afternoon. At 3:15pm, I spoke with Ms. Doran, but only after the notice
9 of removal of the state court complaint had been filed with this Court.

I declare under penalty of perjury under the laws of the State of Washington and of the
United States that the foregoing is true and correct.

Dated this 4th day of March 2021, at Spokane, Washington.

By s/*David J. Groesbeck*
David J. Groesbeck, WSBA# 24749